



ILLINOIS COMMERCE COMMISSION **2022** Summer Preparedness Policy Session

Illinois Consumers/Ratepayers Advocates' Perspectives

June 13, 2022

THE OFFICE OF THE ATTORNEY GENERAL OF THE STATE OF ILLINOIS

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Today's Agenda

- Ongoing Challenges: Energy Insecurity & Energy Burden
- Coming Out of the Winter Disconnection Moratorium
- Deeper Dive Into the Codified Compliance Reports (Examples)
- Takeaways & Recommendations



Ongoing Challenges: Minimize Energy Insecurity



- **Energy Insecurity** describes an Illinois consumer's inability to adequately meet basic household heating, cooling, and energy needs. It conjures various equity issues, all of which seek to minimize having residents dangerously under-heat or under-cool their homes or forego other essentials such as rent or mortgage payments, food or medicine.



Ongoing Challenges: Reduce High, Severe Energy Burdens



- **Energy Burden** is a metric researchers use to understand what levels of Energy Insecurity consumers are facing. It means the share of household income used to pay annual energy costs.
 - An energy burden greater than six percent (> 6%) is a **high energy burden**.
 - An energy burden greater than 10 percent (> 10%) is a **severe energy burden**.

¹ Ariel Dreihobl, Lauren Ross, & Roxana Ayala. "How High Are Household Energy Burdens? An Assessment of National and Metropolitan Energy Burden Across the United States," American Council for an Energy-Efficient Economy, 11 (September 10, 2020). Available at: <https://www.aceee.org/research-report/u2006> (hereinafter, "AEEE September 2020 Report").

² *Id.* at ii. This definition comes from a widely accepted principle that total shelter costs should not exceed 30 percent of income and that utility costs should not exceed 20 percent of those shelter costs, leading to the conclusion that an affordable energy burden should be at or below six percent of household income (20% x 30% = 6%). See also, U.S. Department of Energy, Energy Efficiency and Renewable Energy Office, "Clean Energy for Low Income Communities Accelerator Fact Sheet," available at <https://betterbuildingssolutioncenter.energy.gov/sites/default/files/attachments/Better%20Buildings%20Clean%20Energy%20for%20Low%20Income%20Communities%20Accelerator%20Factsheet.pdf>.



92% of low-income IL households have severe energy burdens

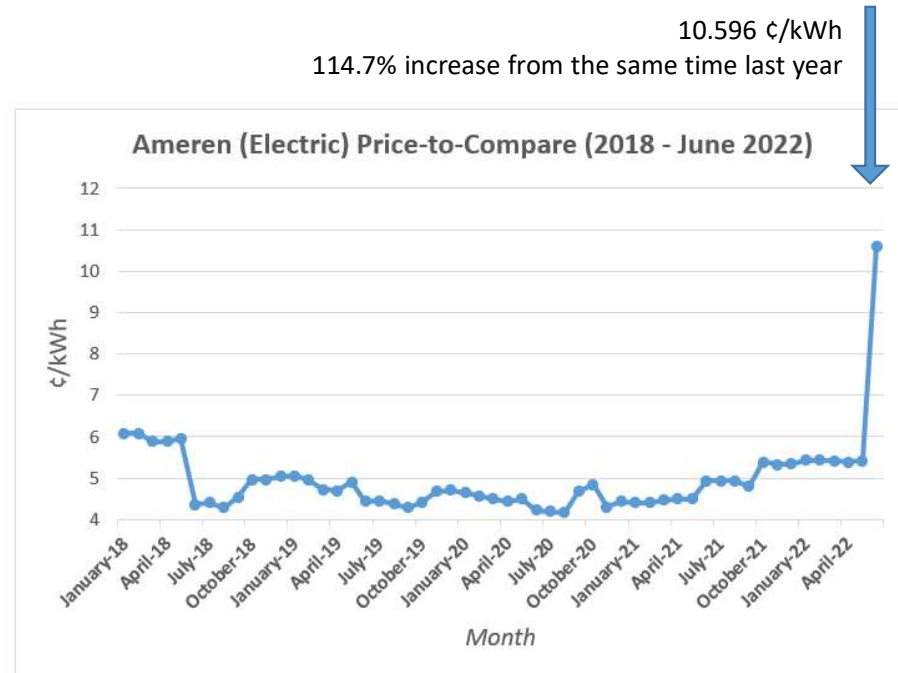
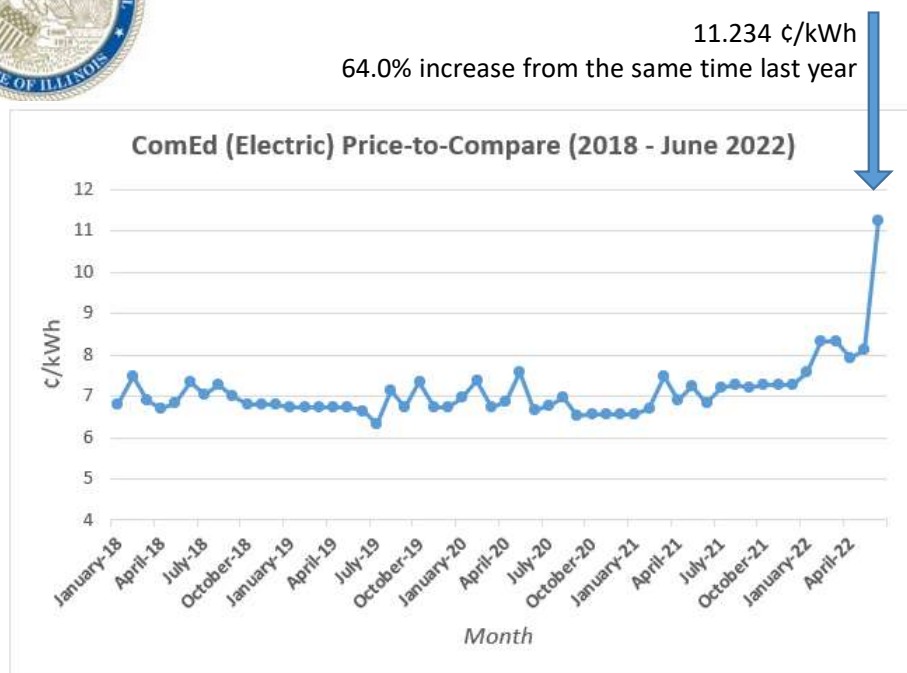
- There are **1.435 million Illinois households** that struggle at/below 200% of the FPL. Nearly half of these households have a severe energy burden of 16% and 30%.¹
- According to a September 2020 study, the Energy Burden for **a median household in the United States is 3.1% of income**.²
 - Low-Income households spend **three times more** of their income on energy costs compared to the median spending of non-low-income households (8.1% vs. 2.3%).
 - In Chicago, **1 out of 5 households** (or 704,117 of 3.56 million) have a high energy burden (> 6%). Over 50% of these households also are categorized with a severe energy burden (> 10%).

¹ See Fisher, Sheehan & Colton, Home Energy Affordability Gap (2nd Series), Published April 2020. Available at www.homeenergyaffordabilitygap.com.

² AEEE September 2020 Report, at 11.



Historically low energy supply prices coming to an end?



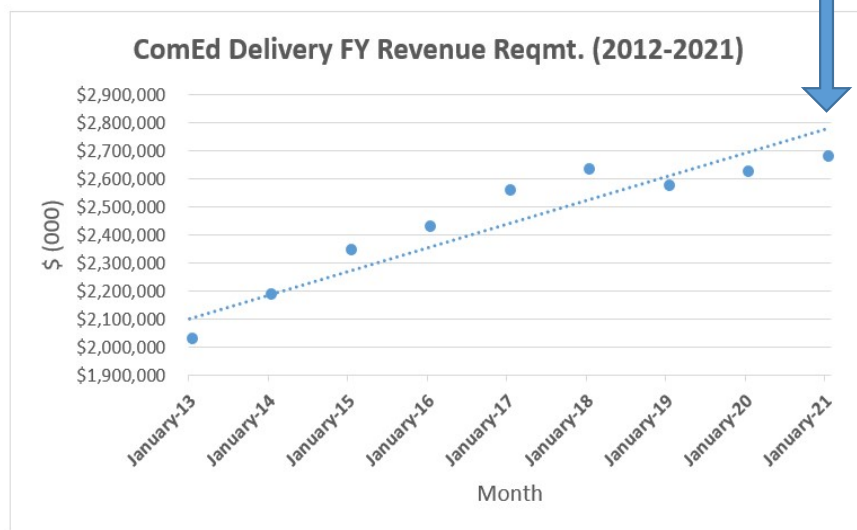
- ComEd's price-to-compare of **11.234 ¢/kWh** for June is a **38.1% increase** from May (8.135 ¢/kWh).
- Ameren's price-to-compare of **10.596 ¢/kWh** for June is **95.5% increase** from May (5.149 ¢/kWh).

Source: Data available at <https://www.pluginillinois.org/>. Graphs showing price-to-compare ("PTC") includes purchased electricity adjustment ("PEA") for each month.

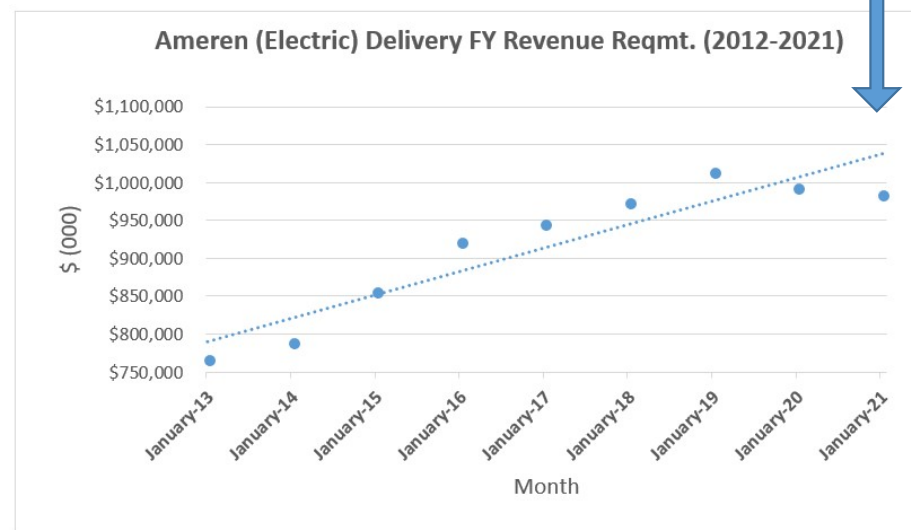


Electric utilities' revenue requirements climbed during that time

**37.41% Increase
Since 2012 (\$2.68B)**



**26.09% Increase
Since 2012 (\$982.6M)**



- ComEd's revenue requirement has risen from \$1.95B in June 2012 to \$2.68B as of January 1, 2021.
- Ameren's revenue requirement has risen from \$779.3M in Sept. 2012 to \$982.6M as of January 1, 2021.

Source: For ComEd, see orders in ICC Dkt. Nos. 11-0721, 12-0321, 13-0318, 14-0312, 15-0287, 16-0259, 17-0196, 18-0808, 19-0387, 20-0393. For Ameren, see orders in ICC Dkt. Nos. 12-0001, 12-0293, 13-0301, 14-0317, 15-0305, 16-0262, 17-0197, 18-0807, 19-0436, 20-0381



Winter moratorium provides relief from disconnections

- **Health and safety protections bar disconnections:**
 - “On any day when the National Weather Service forecast for the following 24 hours covering the area of the utility in which the residence is located includes a forecast that the temperature will be 32 degrees Fahrenheit or below” (220 ILCS 5/8-205(a)(1)); and
 - “During the period of time from **December 1 through and including March 31** of the immediately succeeding calendar year” (220 ILCS 5/8-206(a)).¹
- **However, the “Winter Disconnection Moratorium” also means:**
 - Consumer’s bills (and arrearages) can escalate with cold/colder temperatures.
 - Payment of high bills can be delayed until non-winter months (April 1).
 - **Flexible, generous, and reasonable** payment plans and assistance programs are essential to ensuring consumers can avoid disconnections between April and November.

¹ There is also a Summer Moratorium in Section 8-206(b). See 220 ILCS 5/8-206(b).



Utilities agree to extend flexible repayment options to July 31

- At the request of the ICC and consumer advocates, including the Office of the Illinois Attorney General, the State's largest utilities committed to make available flexible, more generous payment plans through July 31.
 - Extended repayment plans.** 12 to 18-month DPAs (with zero down for low-income customers, and zero to 25% down for non low-income customers).
 - Staggered/Phased Disconnections.** Disconnection notices were staggered based on a customer's arrearage level (e.g., compared to the average residential customer arrearage as of January 31)

Deferred Payment Arrangement (DPA): Post-Winter Moratorium (Beginning ~April 1)

Utility	Low-Income DPA	Non-Low-Income DPA	Offer Expiration Date
ComEd	12 months, zero-down	12 months, 10% down	July 31
PGL/NSG	18 months, zero-down	18 months, 25% down	
Nicor	18 months, zero-down	18 months, zero-down	
Ameren	18 months, zero-down	12 months, 10% down	

Source: ICC Press Release (March 31, 2022), "Following ICC Request, Largest Regulated Electric and Gas Utilities Offer Consumer Protections to Prevent Disconnections."
Available at: <https://www.illinois.gov/news/press-release.24695.html>



Deeper Dive: Utility compliance reports

- The June 18, 2020 Stipulation required monthly reporting from large and small utilities through August 31, 2021 and quarterly Covid-19 cost reports through December 31, 2022.
- The Climate and Equitable Jobs Act ("CEJA", Public Act 102-0662) codified twenty-two (22) metrics, including most of the sixteen (16) metrics required in the June 18, 2020 Stipulation.
 - Section 8-201.10 require each "public utility [to] report to the Commission by the 15th day of each month" the metrics "for the immediately preceding month[.]" 220 ILCS 5/8-201.10(b).
 - The utility compliance reports must be "ma[d]e publicly available in executable, electronic spreadsheet format," and be provided "by zip code." *Id.*
 - The utility compliance filings are available at the ICC's website ([Link](#)).
- Deeper Dive: What are some ways the data can help us better understand, implement, and improve/enhance efforts aimed at keeping Illinois customers connected?



Deeper Dive: Compliance reports (Examples)



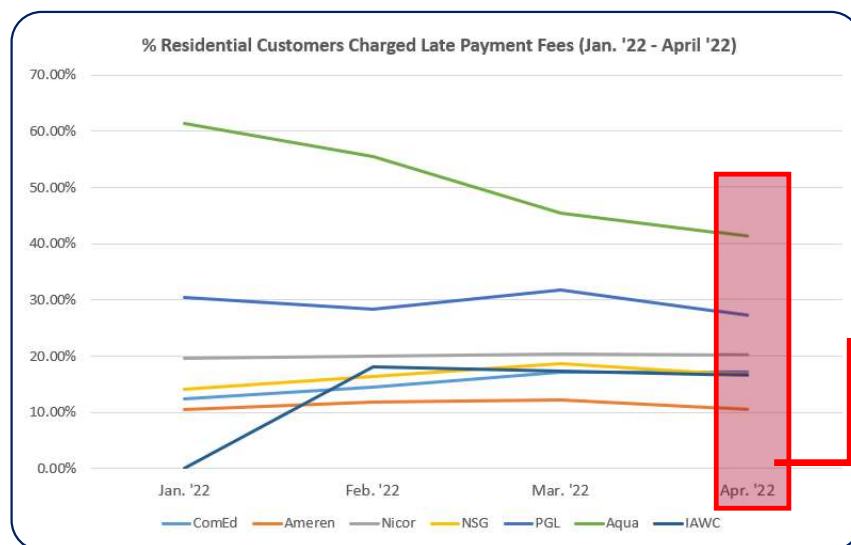


Deeper Dive: Compliance reports (Examples)





Deeper Dive: Late Payment Fees/Charges



Utility	Jan. '22	Feb. '22	Mar. '22	Apr. '22
ComEd	12.36%	14.58%	17.13%	17.09%
Ameren	10.57%	11.86%	12.21%	10.41%
Nicor	19.67%	19.92%	20.35%	20.22%
NSG	14.15%	16.36%	18.73%	16.55%
PGL	30.41%	28.29%	31.70%	27.29%
Aqua	61.42%	55.58%	45.45%	41.22%
IAWC	0.09%	18.11%	17.36%	16.48%

(# and %) of RES'L Accts. Charged Late Payments				
Utility	(#) Apr. '22	(%) RES'L	(#) Apr. '21	(%) RES'L
ComEd	638,734	17.09%	647,400	17.48%
Ameren	188,687	10.41%	122,830	10.49%
Nicor	457,435	20.22%	388,835	18.87%
NSG	24,904	16.55%	27,080	18.02%
PGL	220,456	27.29%	243,313	30.23%
Aqua	26,742	41.22%	26,053	35.39%
IAWC	56,842	16.48%	46,710	13.67%
Totals >>>	1,613,800	17.58%	1,502,221	18.06%

- ComEd has – on average – charged over 570,000, or 15.29% of its residential customers monthly with late payment fees this year. PGL has consistently charged 237,737, or nearly 30% of its residential customers with late payment fees, each month over this same period.
- Small variance in month-to-month charges (by %) strongly suggests that the same residential customers are being charged.



Deeper Dive: Compliance reports (April 2022, ComEd)

- Example 1: Below are six (6) metrics taken from ComEd's April 2022 compliance report. Let's take a deeper dive into Metric 10 (late payment fees/charges) and see what we can learn from this metric alongside arrearage information (Metrics 19-22). See 220 ILCS 5/8-201.10(b)(10), (19)-(22).

	A	B	C	D	E	F
Zip Code	1) RES'L Number of Customers -TOTAL	10) RES'L Number with Assessed Late Payment Fees or Charges - TOTAL	19) RES'L No. of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	20) RES'L Dollar Volume of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	21) RES'L No. of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)	22) RES'L Dollar Volume of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)
00000	171	19	0	\$0	9	\$7,990
06014	0	0	0	\$0	0	\$0
06040	0	0	0	\$0	0	\$0
60001	8	5	0	\$0	1	\$282
60002	10,877	1,454	3	\$220	533	\$200,931
60003	1	0	0	\$0	0	\$0
60004	21,432	1,921	2	\$894	610	\$162,375
60005	13,794	1,605	7	\$3,735	667	\$195,073
60006	0	0	0	\$0	0	\$0
60007	14,115	1,422	7	\$3,331	595	\$156,416



Deeper Dive: Compliance reports (April 2022, ComEd)

We can use the data to calculate the (%) of residential customers in a zip code who are assessed late fees/charges.



We can also calculate the average past-due ("PD") balance (\$) of a residential customer not taking service under a DPA.



	A	B	B/A	C	D	E	F	F/E	E/B
Zip Code	1) RES'L Number of Customers -TOTAL	10) RES'L Number with Assessed Late Payment Fees or Charges - TOTAL	% of RES'L Customers Assessed Late Payment Fees or Charges	19) RES'L No. of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	20) RES'L Dollar Volume of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	21) RES'L No. of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)	22) RES'L Dollar Volume of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)	Avg. PD Balance Per RES'L Not Taking Service Under DPA	% of RES'L Customers Assessed Late Payment Fees Not Taking Service Under DPA
00000	171	19	11.11%	0	\$0	9	\$7,990	\$ 887.83	47.37%
06014	0	0	0	0	\$0	0	\$0	0	0
06040	0	0	0	0	\$0	0	\$0	0	0
60001	8	5	62.50%	0	\$0	1	\$282	\$ 281.74	20.00%
60002	10,877	1,454	13.37%	3	\$220	533	\$200,931	\$ 376.98	36.66%
60003	1	0	0.00%	0	\$0	0	\$0	0	0
60004	21,432	1,921	8.96%	2	\$894	610	\$162,375	\$ 266.19	31.75%
60005	13,794	1,605	11.64%	7	\$3,735	667	\$195,073	\$ 292.46	41.56%
60006	0	0	0	0	\$0	0	\$0	0	0
60007	14,115	1,422	10.07%	7	\$3,331	595	\$156,416	\$ 262.88	41.84%



Deeper Dive: Compliance reports (April 2022, ComEd)

SORTING by this metric enables us to identify zip codes with the highest percentage of residential customers assessed late fees.

While there may be a high percentage of customers assessed late fees, the average PD balances are not at all among the highest.

	A	B	B/A	C	D	E	F	F/E	E/B
Zip Code	1) RES'L Number of Customers -TOTAL	10) RES'L Number with Assessed Late Payment Fees or Charges - TOTAL	% of RES'L Customers Assessed Late Payment Fees or Charges	19) RES'L No. of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	20) RES'L Dollar Volume of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	21) RES'L No. of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)	22) RES'L Dollar Volume of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)	Avg. PD Balance Per RES'L Not Taking Service Under DPA	% of RES'L Customers Assessed Late Payment Fees Not Taking Service Under DPA
60621	12,981	4,986	38.41%	37	\$8,336	3,195	\$1,273,464	\$ 398.58	64.08%
60649	25,251	9,458	37.46%	52	\$13,313	5,957	\$1,744,044	\$ 292.77	62.98%
60827	8,988	3,259	36.26%	24	\$3,861	1,854	\$694,914	\$ 374.82	56.89%
60472	1,674	602	35.96%	2	\$699	334	\$175,469	\$ 525.36	55.48%
60484	455	160	35.16%	3	\$234	92	\$28,180	\$ 306.31	57.50%
60636	12,072	4,244	35.16%	31	\$12,833	2,614	\$1,050,318	\$ 401.80	61.59%
60644	18,098	6,312	34.88%	76	\$21,361	4,746	\$1,595,067	\$ 336.09	75.19%
60426	12,381	4,277	34.54%	28	\$11,713	2,386	\$1,044,860	\$ 437.91	55.79%
60624	15,058	5,051	33.54%	64	\$19,216	3,944	\$1,402,994	\$ 355.73	78.08%
60637	23,795	7,980	33.54%	45	\$11,278	4,812	\$1,405,413	\$ 292.06	60.30%



Deeper Dive: Compliance reports (April 2022, ComEd)

Notice these percentages are not among the highest.

SORTING by this metric allows us to identify those zip codes where average arrearages are among the highest, without taking service under a DPA.

	A	B	B/A	C	D	E	F	F/E	E/B
Zip Code	1) RES'L Number of Customers -TOTAL	10) RES'L Number with Assessed Late Payment Fees or Charges - TOTAL	% of RES'L Customers Assessed Late Payment Fees or Charges	19) RES'L No. of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	20) RES'L Dollar Volume of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	21) RES'L No. of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)	22) RES'L Dollar Volume of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)	Avg. PD Balance Per RES'L Not Taking Service Under DPA	% of RES'L Customers Assessed Late Payment Fees Not Taking Service Under DPA
61059	61	12	19.67%	0	\$0	10	\$27,175	\$ 2,717.51	83.33%
61053	29	1	3.45%	0	\$0	2	\$3,668	\$ 1,834.19	200.00%
60958	55	16	29.09%	0	\$0	16	\$28,109	\$ 1,756.83	100.00%
61378	229	35	15.28%	0	\$0	10	\$15,257	\$ 1,525.73	28.57%
61349	365	46	12.60%	0	\$0	18	\$27,092	\$ 1,505.11	39.13%
60944	137	32	23.36%	2	\$932	26	\$38,521	\$ 1,481.59	81.25%
60134	2,689	193	7.18%	0	\$0	57	\$82,675	\$ 1,450.44	29.53%
61018	473	60	12.68%	0	\$0	19	\$26,906	\$ 1,416.09	31.67%
61739	103	9	8.74%	0	\$0	4	\$5,443	\$ 1,360.68	44.44%
61012	845	167	19.76%	0	\$0	64	\$85,094	\$ 1,329.59	38.32%



Deeper Dive: Compliance reports (April 2022, ComEd)

Applying the premise that customers assessed late fees do not immediately seek payment assistance (and thereby incur such charges over multiple months), this calculation shows the percentage (%) of those PD accounts that were assessed late fees but are not taking service under a DPA.

	A	B	B/A	C	D	E	F	F/E	E/B
Zip Code	1) RES'L Number of Customers -TOTAL	10) RES'L Number with Assessed Late Payment Fees or Charges - TOTAL	% of RES'L Customers Assessed Late Payment Fees or Charges	19) RES'L No. of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	20) RES'L Dollar Volume of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	21) RES'L No. of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)	22) RES'L Dollar Volume of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)	Avg. PD Balance Per RES'L Not Taking Service Under DPA	% of RES'L Customers Assessed Late Payment Fees Not Taking Service Under DPA
61101	8,685	2,201	25.34%	39	\$14,560	1,828	\$795,249	\$ 435.04	83.05%
60944	137	32	23.36%	2	\$932	26	\$38,521	\$ 1,481.59	81.25%
60624	15,058	5,051	33.54%	64	\$19,216	3,944	\$1,402,994	\$ 355.73	78.08%
60653	16,498	5,257	31.86%	51	\$8,788	4,040	\$1,180,793	\$ 292.28	76.85%
61001	267	46	17.23%	1	\$257	35	\$21,805	\$ 622.99	76.09%
61102	6,577	1,697	25.80%	16	\$4,683	1,285	\$511,020	\$ 397.68	75.72%
61103	10,914	2,587	23.70%	46	\$12,872	1,957	\$786,556	\$ 401.92	75.65%
60644	18,098	6,312	34.88%	76	\$21,361	4,746	\$1,595,067	\$ 336.09	75.19%
60934	124	20	16.13%	0	\$0	15	\$11,341	\$ 756.08	75.00%
60612	16,319	3,948	24.19%	49	\$12,434	2,934	\$930,882	\$ 317.27	74.32%



Deeper Dive: Compliance reports (April 2022, ComEd)

Below are the zip codes that appeared as among the highest across each calculation (in yellow).

60621	Englewood
60649	South Shore
60827	Riverdale
60472	Robbins
60484	University Park
60636	West Englewood
60644	Austin
60426	Harvey
60624	West Garfield Park
60637	Woodlawn

61059	Nora
61053	Mount Carroll
60958	Pembroke Township
61378	West Brooklyn
61349	Ohio
60944	Hopkins Park
60134	Geneva
61018	Dakota
61739	Fairbury
61012	Capron

61101	Rockford
60944	Hopkins Park
60624	West Garfield Park
60653	Grand Boulevard
61001	Apple River
61102	Rockford
61103	Rockford
60644	Austin
60934	Emington
60612	Near West Side



Deeper Dive: Compliance reports (April 2022, ComEd)

Below are the zip codes that appeared as among the highest across each calculation (in yellow). **Three (3) of them appear more than once.**

60621	Englewood
60649	South Shore
60827	Riverdale
60472	Robbins
60484	University Park
60636	West Englewood
60644	Austin
60426	Harvey
60624	West Garfield Park
60637	Woodlawn

61059	Nora
61053	Mount Carroll
60958	Pembroke Township
61378	West Brooklyn
61349	Ohio
60944	Hopkins Park
60134	Geneva
61018	Dakota
61739	Fairbury
61012	Capron

61101	Rockford
60944	Hopkins Park
60624	West Garfield Park
60653	Grand Boulevard
61001	Apple River
61102	Rockford
61103	Rockford
60644	Austin
60934	Emington
60612	Near West Side



Deeper Dive: Compliance reports (April 2022, Ameren - Electric)

- Example 2: Below are seven (7) metrics from Ameren's April 2022 compliance report. Here, we have added Metric 8 (customers who failed to complete their DPAs). Let's see what we can learn from this metric alongside the other metrics. See 220 ILCS 5/8-201.10(b)(8), (10), (19)-(22).

↓

	A	B	C	D	E	F	G
Zip Code	1) RES'L Number of Customers - TOTAL	8) RES'L Number of Payment Agreements that Failed - TOTAL	10) RES'L Number with Assessed Late Payment Fees or Charges - TOTAL	19) RES'L No. of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	20) RES'L Dollar Volume of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	21) RES'L No. of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)	22) RES'L Dollar Volume of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)
60518	132	1	11	6	\$1,638	2	\$501
60536	107	0	10	0	\$0	2	\$120
60537	249	0	26	4	\$3,354	5	\$790
60541	775	6	76	14	\$6,736	29	\$2,501
60545	3	0	1	0	\$0	0	\$0
60549	315	4	23	9	\$11,979	5	\$1,744
60551	945	7	109	31	\$23,909	23	\$6,337
60557	97	1	12	5	\$1,565	1	\$46
60560	31	0	3	0	\$0	0	\$0
60911	323	6	33	6	\$7,638	22	\$5,444



Deeper Dive: Compliance reports (April 2022, Ameren - Electric)

SORTING by this metric shows those zip codes with the highest number of customers who fail to complete their DPAs.



Notice that the avg. DPA arrearages per customer, are not among the highest.



	A	B	C	D	E	E/D	F	G
Zip Code	1) RES'L Number of Customers - TOTAL	8) RES'L Number of Payment Agreements that Failed - TOTAL	10) RES'L Number with Assessed Late Payment Fees or Charges - TOTAL	19) RES'L No. of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	20) RES'L Dollar Volume of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	Avg. PD Balance Per Acct. Taking Service Under DPA	21) RES'L No. of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)	22) RES'L Dollar Volume of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)
62040	18,196	423	2,466	1,402	\$681,443	\$ 486.05	1,216	\$328,135
62226	13,693	372	1,760	1,351	\$802,650	\$ 594.12	750	\$187,196
62002	14,217	331	1,898	1,156	\$638,409	\$ 552.26	1,005	\$266,687
62521	15,987	325	2,060	1,246	\$678,253	\$ 544.34	926	\$274,457
62526	15,201	313	2,387	1,675	\$962,634	\$ 574.71	784	\$185,650
61832	15,011	297	2,086	1,464	\$787,204	\$ 537.71	1,840	\$539,922
62206	5,269	296	1,321	1,251	\$846,975	\$ 677.04	602	\$196,019
61604	13,402	292	2,213	1,567	\$955,249	\$ 609.60	1,268	\$352,898
62221	12,698	275	1,654	1,206	\$744,987	\$ 617.73	463	\$126,203
62234	13,274	240	1,538	834	\$433,016	\$ 519.20	587	\$175,996



Deeper Dive: Compliance reports (April 2022, Ameren - Electric)

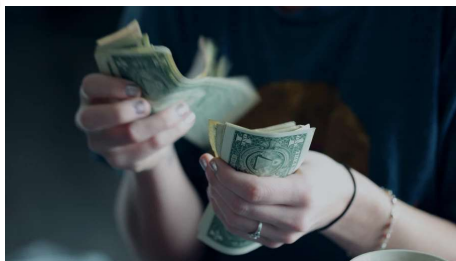
Notice that if we look at those customers' arrearages who are not taking service under a DPA, these balances are even lower than the avg. customer's DPA balance. This (again) goes against conventional wisdom.



	A	B	C	D	E	E/D	F	G	F/G	F/C
Zip Code	1) RES'L Number of Customers - TOTAL	8) RES'L Number of Payment Agreements that Failed - TOTAL	10) RES'L Number with Assessed Late Payment Fees or Charges - TOTAL	19) RES'L No. of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	20) RES'L Dollar Volume of PD>30 Accts. Taking Service under DPA - TOTAL (beginning of month)	Avg. PD Balance Per Acct. Taking Service Under DPA	21) RES'L No. of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)	22) RES'L Dollar Volume of PD>30 Accts. Not Taking Service under DPA - TOTAL (beginning of month)	Avg. PD Balance Per RES'L Not Taking Service Under DPA	% of RES'L Customers Assessed Late Payment Fees Not Taking Service Under DPA
62040	18,196	423	2,466	1,402	\$681,443	\$ 486.05	1,216	\$328,135	\$269.85	49.31%
62226	13,693	372	1,760	1,351	\$802,650	\$ 594.12	750	\$187,196	\$249.59	42.61%
62002	14,217	331	1,898	1,156	\$638,409	\$ 552.26	1,005	\$266,687	\$265.36	52.95%
62521	15,987	325	2,060	1,246	\$678,253	\$ 544.34	926	\$274,457	\$296.39	44.95%
62526	15,201	313	2,387	1,675	\$962,634	\$ 574.71	784	\$185,650	\$236.80	32.84%
61832	15,011	297	2,086	1,464	\$787,204	\$ 537.71	1,840	\$539,922	\$293.44	88.21%
62206	5,269	296	1,321	1,251	\$846,975	\$ 677.04	602	\$196,019	\$325.61	45.57%
61604	13,402	292	2,213	1,567	\$955,249	\$ 609.60	1,268	\$352,898	\$278.31	57.30%
62221	12,698	275	1,654	1,206	\$744,987	\$ 617.73	463	\$126,203	\$272.58	27.99%
62234	13,274	240	1,538	834	\$433,016	\$ 519.20	587	\$175,996	\$299.82	38.17%



Key Takeaways & Recommendations¹



Order Flexible DPA and Collection Practices Continue

The availability of extended DPAs will end on July 31. Utilities should continue to make these options available for customers. **Commission rules for DPAs provide significant flexibility for utilities to accommodate a customer's energy insecurities and energy burdens.** Utilities have the discretion to offer longer DPAs that account for a customer's ability to successfully complete it, but data show consistently short DPA lengths. See 85 Ill. Adm. Code 280.120(g)(1)-(2).



Leverage New Data to Identify, Target Flexible DPAs

Metrics now codified in CEJA and publicly available to the utilities and ICC can be used to identify communities and customers most vulnerable and in need of assistance. **The ICC should encourage utilities to use the utility reports to develop smart and efficient targeted efforts** that could significantly reduce the risk of customers being disconnected. **The data should also be used to inform and improve changes to Part 280 (83 Ill. Adm. Code 280).**



Prohibit Disconnections Where Customers Pay Affordable Amount

The Commission should exercise its authority to define, establish, and demand utilities help ensure all Illinois residents "receive essential levels of heat and electric service regardless of economic circumstance." 305 ILCS 20/2(a)(1). To that end, it should **define affordability for energy cost at/below 6% of annual household income**, with an aim towards the national median energy burden of 3.1% of annual household income, and set a standard of 4% of annual household for water and wastewater affordability.

¹ See also Comments of the People of State of Illinois and Reply Comments of the People of the State of Illinois, filed September 30, 2020 and October 30, 2020, respectively, in Docket No. 20-NOI-01, available at <https://www.icc.illinois.gov/notice-of-inquiry/20-noi-01>.



Questions



“The true measure of any society can be found in how it treats its most vulnerable members.”

~ MAHATMA GANDHI





Thank you!

THE OFFICE OF THE ATTORNEY GENERAL
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